



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SITE: J + W Pallet + Drum
BREAK: 2.9
OTHER: v. 2

APR 04 2005

ACTION MEMORANDUM

DATE: **APR 04 2005**

SUBJECT: Request for a Ceiling Increase for the Removal Action at the J&W Pallet and Drum Service Site in Atlanta, Fulton County, Georgia

FROM: Karen Buerki *KB*
On-Scene Coordinator

TO: Winston A. Smith, Director
Waste Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a ceiling increase for the removal action described herein for the J&W Pallet and Drum Service Site (the Site) in Atlanta, Fulton County, Georgia. Additional funds are requested to complete the removal and disposal of the hazardous substances. The proposed work is necessary to complete the removal of hazardous substances from this Site. This memo requests an additional \$65,000 which will increase the total site ceiling to \$315,000. The additional funds would come from the FY05 Removal advice of allowance.

II. SITE CONDITIONS AND BACKGROUND

A removal action was approved in an Emergency Action Memorandum signed June 25, 2004. On June 22, 2004, the Emergency Response and Removal Branch initiated the removal action. The following activities have been conducted at the Site:

1. Uncontrolled releases of hazardous substances have been secured.
2. All waste has been characterized, bulked and sampled, and waste profiles completed.



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3. Most of the dilapidated roof has been removed and connection to the City of Atlanta sewer system has been repaired allowing rainwater to flow to the sewer as opposed to accumulating in and under the facility.
4. Contaminated soil, debris, and RCRA empty drums have been removed and disposed of off-site.
5. The Site has been secured with chainlink fencing and posted to deter trespassing.

The Emergency and Rapid Response Services Contractor (ERRS) is prepared to begin completion of the removal action. The scope of work remaining includes disposal of all hazardous substances secured at the Site. Funds currently available are not sufficient to implement these actions. This ceiling increase is necessary to secure adequate funding.

Due to the unknown content of the thousands of drums and totes and dilapidated condition of the facility, costs were underestimated. Therefore, a ceiling increase is necessary to complete the actions proposed in the original Action Memorandum.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The threats posed by this Site are detailed in the Action Memorandum dated June 25, 2004 (refer to Attachment A). These threats continue to exist and will worsen if response actions are delayed.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of the hazardous substances from this site, if not addressed by implementing the removal action selected in this Action Memorandum, may present an imminent and substantial endangerment to the public health or welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

Proposed actions include the transportation and disposal of hazardous substances to an approved disposal facility. Rental storage tanks will be decontaminated and returned to their vendors.

B. Estimated Costs

	Current	Increase	Proposed
START-2	\$ 50,000	\$15,000	\$ 65,000
ERRS	\$200,000	\$35,000	\$235,000
Contingency	\$ 0	\$15,000	\$ 15,000
Total Site Ceiling			\$315,000 ¹

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If action is significantly delayed or not taken, hazardous substances contained in tanks and drums could be released to the environment. Since completion of the bulking and securing of the hazardous substances, there is evidence of vandalism at the site. Hazardous substances released could affect the surrounding residents.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

No viable PRPs have been identified. If additional information becomes available during the removal action, appropriate enforcement activities will be taken. Susan Hansen, Assistant Regional Counsel, was consulted on the enforcement strategy. The attached Enforcement Addendum describes the enforcement strategy (refer to Attachment B).

¹Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the J&W Pallet and Drum Service Site in Atlanta, Fulton County, Georgia, and has been developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. The document is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal and I recommend your approval of the proposed ceiling increase. The total project ceiling, if approved, will be \$315,000. Of this, an estimated \$250,000 comes from the FY04 Regional removal allowance and \$65,000 comes from the FY05 Regional removal allowance.

Approved: Winston A. Smith Date: 4-4-05

Disapproved: _____ Date: _____

Winston A. Smith, Director
Waste Management Division

Attachments (2)

Attachment A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

U.S. ENVIRONMENTAL PROTECTION AGENCY \$250,000 EMERGENCY ACTION MEMORANDUM/INITIAL POLLUTION REPORT

Date: June 25, 2004

Subject: **NOTIFICATION OF \$250,000 ACTIVATION**
J&W Pallet and Drum Co. (Site)
Atlanta, Fulton County, Georgia 30310

To: Regional Response Center, 4WD-ERRB
GAEPD
EPA-HQ, Regional Coordinator
Site File

From: Karen Buerki, On-Scene Coordinator
U.S. EPA Region 4

Site No: A4FG	Task Order No: 0206-F4-0020
ERNS No: NRC #725818	TO Amount: \$200,000
NPL Status: Non-NPL	Contractor: WRS Infrastructure and Environment
CERCLIS No: GAD984310797	Response Authority: CERCLA
State Notification: 06/22/04	Start Date: 06/22/04
Demobilization Date: TBD	Completion Date: TBD

I. INTRODUCTION

On June 22, 2004, Karen Buerki, On-Scene Coordinator (OSC), was dispatched to 1121 Allene Avenue at the request of the Atlanta Fire Department to investigate a discharge of unknown liquid to a storm drain. A removal site evaluation in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.410, has determined that there is a threat to public health or welfare or the environment posed by the presence of approximately 1000 drums and various containers labeled or hazard categorized as flammable, corrosive, oxidizer, listed hazardous waste, or poison liquids contained in and around a dilapidated warehouse, corroded and unsecured acetylene cylinders, and a discharge of unknown chemicals to a near-by storm drain from the J&W Pallet and Drum Co. Based on the removal site evaluation, the OSC has determined that the Site presents an imminent and substantial endangerment to public health or welfare or the environment and meets the criteria for

initiating a Removal Action under Section 300.415 of the NCP. As a result of Site conditions, immediate action pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), is necessary at the Site.

Pursuant to EPA Region 4 Delegation 14-2. Response, authority to obligate CERCLA funding in the amount of \$250,000 to initiate Removal Actions where site conditions constitute an emergency has been delegated to the OSC. The OSC has approved the use of CERCLA funding to mitigate the threat to public health or welfare or the environment at the J&W Pallet and Drum Co. Site.

II. BACKGROUND

The Site is located at 1121 Allene Avenue, Atlanta, Fulton County, Georgia. This facility no longer has electrical or water service and the roof has collapsed on top of the drums and other containers inside. There is limited access restriction to the Site. Residential property is within walking distance. Light industrial and heavily-trafficked commercial property surround the Site.

When the facility was operational, it was used for drum recycling. The warehouse is currently full of drums and containers with residual hazardous waste in them. Seven drums have been found to be full, however, due to the condition of the roof and amount of overgrowth in the yard, the exact contents of the warehouse and property cannot be ascertained. The facility has not been operational as a permitted business since 2002, however, soil staining, factory seals, container labels, tote placards on the ground outside the front door and inside the warehouse, with dates as recent as April 2004, indicate unauthorized drum recycling has occurred. Liquid waste has accumulated on the floor and is flowing through the mortar of a blocked-up doorway.

III. THREAT

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2)(iii), (v), (vi), and (vii) directly apply as follows to the conditions at the Site:

- A. 300.415 (b)(2)(iii) "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release"

There are approximately 1000 drums and containers with hazardous substance contents crushed, toppled over, or otherwise deteriorating under a collapsed warehouse roof at this Site. The contents of these containers will continue to release unless action is taken.

- B. 300.415 (b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released"

The collapsed roof allows rain water to wash over the drums and floor and subsequently carrying hazardous substances out to a near-by storm drain.

- C. 300.415 (b)(2)(vi) "Threat of fire or explosion"

Drums containing acids, bases, and oxidizers are commingled with solvents and other organic solutions which are incompatible. At least five acetylene cylinders were found unsecured and beginning to corrode.

- D. 300.415 (b)(2)(vii) "The availability of other appropriate Federal or State response mechanisms to respond to the release"

Georgia Environmental Protection Division is unable financially to address the problems at the Site. Action will not otherwise be provided in a timely basis.

IV. SCOPE OF WORK

With the \$250,000 emergency funding, the OSC proposes to:

- A. Establish access to the Site by clearing and grubbing.
- B. Sample containers and perform hazard categorization or obtain analytical data necessary for disposal.
- C. Provide a fence around the facility to prevent unauthorized access.
- D. Over-pack, bulk, wash, or neutralize containers and contents and provide for disposal of the contents and containers.
- E. Return the compressed gas cylinders to the vendors or treat on-site and provide for disposal of the tanks.
- F. Establish access to all of the drums and containers in the warehouse by removing or shoring unstable portions of the roof.
- G. Abate boiler insulation if the analytical indicates asbestos is present.
- H. Sample, excavate, and dispose of contaminated soil and restore the excavated area.

The authorized budget for this Emergency Removal Action is:

START-2	\$ 50,000
ERRS	<u>\$200,000</u>
TOTAL:	\$250,000 ¹

V. OSC ACTION

On June 22, 2004, the OSC determined that a release or threat of a release of hazardous substances exists at the Site. The OSC authorized \$250,000 to initiate an Emergency Removal Action to mitigate the threat to human health or welfare or the environment. Funding will come from the Regional removal allowance. The OSC issued a Task Order and Technical Direction Document to initiate an Emergency Removal Action.

Because the conditions at the Site meet the conditions set forth in Section 300.415 of the NCP, the OSC has initiated funding of this Removal Action.


Karen Buerki, OSC
U.S. EPA Region 4

¹Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Attachment B

ENFORCEMENT ADDENDUM

CONFIDENTIAL - ATTORNEY WORK PRODUCT Enforcement Sensitive - Do Not Release Under FOIA

A. PRP Search

The Site is in a light industrial area and heavily-trafficked commercial area of southwest Atlanta, Georgia. Due to the emergency nature of the removal action, EPA has been unable to fully conduct a PRP search on the Site. EPA's preliminary PRP search has identified two (2) PRPs, though EPA has not been able to recently locate these individuals. Additionally, it is highly likely that these PRPs do not have the financial ability to assist with the necessary response actions:

1. The current owners and operators of the Site (**Recommended PRPs**):

Jesse James Woods, Jr.
5477 Denny Drive
College Park, Georgia 30349
(404)388-7281
(404)696-6267
(Last known address and phone numbers)

Anthony Tyrone Jones
634 Roy Huie Road
Apartment 19-D
Riverdale, Georgia 30274-1700
(Last known address)

The entire Site property is currently owned by Jessie James Woods, Jr. and Anthony Tyrone Jones. Woods and Jones took title to the property on June 11, 1993 from J. Mercer Brown by means of a Warranty Deed. Information gathered by EPA further indicates that Woods and Jones operated the J & W Pallet and Drum Company on the Site from the time of purchase through as recent as April 2004. When the facility was operational, it was used for on-Site drum recycling, including rinsing of the drums and possibly repainting. The facility was originally operating under a permit, but has not been permitted since 2002. Evidence from the facility, however, indicates that unauthorized drum recycling occurred as recently as April 2004.

The EPA On-Scene Coordinator ("OSC"), Karen Buerki, communicated with Mr. Woods when the Site was first discovered. Mr. Woods granted the OSC verbal access and provided her with a key to the Site. Initially, Mr. Woods indicated that he was willing to help with the removal action to the extent he was able, and removed a small number of drums at the start of the

action, but then basically disappeared. The OSC was thereafter unable to reach him using the cell phone number that she had previously used to contact him.

At the initiation of the removal action, Mr. Woods made claims to the OSC that he did not own the property, but rather the past owner, J. Mercer Brown, still owned the property because the deed was never recorded. Thereafter, when a third party became interested in purchasing the property during EPA's removal action, EPA attorney, Susan Hansen, attempted to contact Mr. Woods in order to facilitate a possible sale. The phone number for Mr. Woods was no longer in service, and the cell phone number was not answered on several attempts. Ms. Hansen was finally able to get in touch with Mr. Woods at his cell number on July 22, 2004. Similar to his statements to the OSC, Mr. Woods told Ms. Hansen that he did not own the Site property because the deed was never recorded. However, Ms. Hansen informed Mr. Woods that EPA considered him to be the owner of the property based on the current title documentation for the property. Ms. Hansen also let him know that there was an interested purchaser, and his first question then was "how much?". Ms. Hansen informed Mr. Woods that EPA was attempting to set a meeting up for the following week between all of the interested parties, including the past owner/mortgage note holder, the current owner, the interested buyer, and EPA. Mr. Woods indicated that he would be willing to come to the meeting. Ms. Hansen was thereafter unable to get in touch with Mr. Woods to tell him about the meeting, and left him a message on July 26, 2004 informing him that the meeting had been set for July 28, 2004. Mr. Woods did not attend the meeting and EPA has not heard from him again.

Regardless of Mr. Woods claims that title to the property never transferred from Mr. Brown to Mr. Woods and Mr. Jones, there is sufficient evidence to conclude that Mr. Woods and Mr. Jones are in fact the current owners of the property. The Warranty Deed clearly shows that the transfer of property occurred on November 11, 1993. Under Georgia law, recordation of the deed is not necessary for the legal transfer of property title. Property transfers at the time of "delivery" of the deed to the purchaser. EPA has no information to suggest that title to the property has transferred since the November 11, 1993 transaction. Therefore, Mr. Woods and Mr. Jones are liable as current owners of the Site.

Regardless of their ownership status, information clearly indicates that Mr. Woods and Mr. Jones also operated the Site as a drum reconditioning facility since 1993. Their operations at the Site were the clear cause of the release of hazardous substances at the Site. Therefore, as operators at the Site at the time of disposal, Mr. Jones and Mr. Woods are also liable parties under CERCLA.

On October 22, 2004, EPA mailed Notices of Intent to File a Lien on the Site property to both Mr. Jones and Mr. Woods, at their last known addresses. These were both returned, one as "unclaimed," the other as "attempted not known." Phone numbers for Mr. Woods are no longer answered and/or connected. EPA will continue its efforts to locate Mr. Jones and Mr. Woods to learn more about their financial status, and to attempt to obtain information about generators with whom they did business.

2. The past owner of the property and current lender (**Not Recommended as a PRP at this Time**):

J. Mercer Brown
2028 Chesterfield Drive
Decatur, Georgia
(Contact Mr. Brown through his son, Alan M. Brown, at (678)339-1006)

As stated above, one of the current owners of the property, Mr. Woods, has made claims that Mr. Brown still owns the property. Based on the currently available information, Mr. Brown owned the Site from January 5, 1978 through November 11, 1993, when he sold it to Mr. Woods and Mr. Jones. During Mr. Brown's ownership of the property, he operated it as a tire company. EPA has no evidence at this time showing that hazardous substances were released at the Site during the years that Mr. Brown owned and operated the Site facility. Further, EPA's response action addressed drums, containers, and the hazardous substances in these containers. All available information indicates that these materials were placed at the Site by the current owners, Mr. Jones and Mr. Woods.

Mr. Brown sold the property to Mr. Woods and Mr. Jones on November 11, 1993. This sale, however, was an owner finance agreement. Therefore, upon the sale, Mr. Brown became the secured lender of the property. All of the necessary sales documentation was completed, including the contract of sale, security deed, warranty deed, and note. However, based on statements from Mr. Brown's closing attorney, the deeds and mortgage lien were never filed on the property because they were misplaced by the county when they were originally mailed for filing, and the attorney then never followed up on this to complete the transaction.

Under Georgia law, title to the property did transfer from Mr. Brown to Mr. Woods and Mr. Jones on November 11, 1993. Transfer occurs at the time of "delivery" of the deed, and this occurred at the property closing when all of the involved parties signed the sales documentation. Recordation of the deed is unnecessary to effectuate the transfer of title. Failure to record a lien, however, does put the lien holder at risk that other liens that are filed on the property will take priority over the lien that was not filed, regardless of when the lien was created.

Furthermore, EPA does not have any information at this time that would show that Mr. Brown took any actions at the Site after he sold the Site to Mr. Woods and Mr. Jones that would subject him to liability under CERCLA. The available evidence indicates that Mr. Brown acted only as a lien holder in the property. Oddly, Mr. Brown allowed Mr. Woods and Mr. Jones to retain the property for years without paying their mortgage, but Mr. Brown never foreclosed on the property and this would be a necessary step for Mr. Brown to take back title to the property. Additionally, based on tax records and information obtained from Mr. Brown's son, Mr. Brown paid taxes on the property for several years after the property was sold to Mr. Woods and Mr.

Jones, but this likewise is permissible for a lien holder to do and still remain under the lender liability protections afforded under CERCLA. Such actions are typically viewed as measures taken to simply protect a lien holder's security interest from going into foreclosure by the state.

3. Generators

During the initial phase of the removal action, EPA gathered evidence from the Site concerning possible generators of drums sent to the Site. EPA gathered labels that had been removed from drums previously and stored at the Site, and also took photographs of drums still containing labels. EPA also performed Hazardous Categorization sampling of some of the drums containing labels.

Specific generator PRPs have not yet been named at the Site, as EPA is in the process of continuing its information gathering process. EPA plans to send 104(e) Information Request letters to parties that may have sent drums to the Site based on the labels that were collected and documented.

During the initial phase of the removal action, one party, Coca-Cola Company, assisted in the disposal of certain containers found at the Site. These containers were five-gallon syrup containers with Coke labels. EPA has no information to suggest that Coke was anything other than the distributors of these containers, or that Coke arranged for their disposal at the Site. However, Coke agreed to assist with the disposal of these containers during the removal and to assist EPA in the identification of their source. Coke's assistance with the disposal of these containers helped cut down on a small portion of EPA's response costs. EPA will follow-up with Coke in the near future regarding the source of these containers.

B. Lien Status

On July 28, 2004, EPA perfected a CERCLA §107(l) lien on the Site property. EPA had been contacted by an interested buyer, and based on the possibility of an impending sale, EPA filed the lien to protect EPA's rights in this property. Though a pre-existing mortgage exists for the property as stated above, this mortgage lien was never filed. Under Georgia law, liens that are first recorded take priority over later recorded liens. Therefore, EPA's Superfund lien should take priority over the mortgage lien.

EPA, the interested buyer (Mr. Byron Cocke), and the mortgage holder (Mr. Brown), have recently reached an informal agreement relating to the sale of the property to Mr. Cocke. Due to the somewhat odd circumstances of the case, including the absence of the current owner and EPA's priority lien status, the parties had to come up with a rather unconventional method to accomplish the goals of encouraging redevelopment of the property and recovering response costs incurred by EPA.

As stated above, the current owners are in default of their loan from Mr. Brown, as they

only paid a few mortgage payments at the start of the loan term. Therefore, the current owners are in default of their loan, giving Mr. Brown the right to foreclose on the property. Further, Mr. Brown has paid taxes on the property since the sale, though there is approximately \$3,000 in outstanding taxes currently due.

Under the informal agreement, EPA will recover approximately 80% of the current fair market value of the property (which the parties estimate to be approximately \$87,500). In order to accomplish this, the parties intend to take the following steps. Mr. Cocke is currently performing a Phase 2 investigation on the property and taking other necessary steps to gain Bona Fide Prospective Purchaser status. In the near future, Mr. Brown and Mr. Cocke will enter into a contract for Mr. Cocke to buy the mortgage note on the property for \$17,500. Mr. Cocke will then pay the outstanding taxes and foreclose on the property. Mr. Cocke then plans to bid on the property himself for a minimal amount (assuming there are no other interested buyers, which is likely to be the case). Mr. Cocke will then have an appraisal performed on the property, and EPA will remove its' 107(l) lien. In turn, EPA will then place a 107(r) windfall lien on the property for the difference between the note purchase price of \$17,500 and the property appraisal. If \$17,500 does not turn out to equal at least 20% of the appraised value, Mr. Cocke will pay EPA the difference to ensure that EPA is getting an amount that represents 80% of the total value of the property. Therefore, EPA's windfall lien will be at least \$60,000 (if the property appraises for \$87,500 or less), and if the property appraises for greater than \$87,500, EPA's windfall lien will increase accordingly.

The proposed agreement regarding the transfer of the Site property to Mr. Cocke will ensure the recovery of at least \$60,000, and also accomplish the goals of redevelopment under the Brownsfields amendments. Mr. Cocke intends to utilize the existing building on the property and likely redevelop it into a business studio. The surrounding area is in need of such redevelopment, and this should help encourage similar redevelopment in the area. Further, because Mr. Cocke does not intend to settle the windfall lien at the outset, EPA will apply some type of interest to the windfall lien to account for the future appreciation of the lien amount. EPA is currently having internal discussions regarding the appropriate calculation or interest rate to apply to represent the appreciation of windfall liens, and EPA will apply the selected method to the windfall lien at this Site. Mr. Cocke has stated that he will likely pay off EPA's windfall lien within a few years.

C. Notification of PRPs of Potential Liability and of the Required Removal Action

EPA has not issued Notice of Liability letters at this time. Past correspondence sent to the current owners and operators has been undeliverable at their last known addresses. Based on current information, however, it is unlikely that Mr. Woods and/or Mr. Jones have sufficient funds to conduct the additional response actions needed at the Site. EPA bases this assumption on the fact that J&W Pallet and Drum is out of business, and the fact that Mr. Woods and Mr. Jones have been delinquent on their mortgage loan payments for the property for approximately

10 years.

In the near future, EPA will be conducting further investigations into the possible generators at the Site. These investigations will consist of 104(e) Information Requests to a large number of parties indicated on drums and container labels found at the Site. EPA will also attempt to locate and obtain further information about generators from the owners and operators of the Site.

D. Decision Whether to Issue an Order

There are no known viable parties for order issuance.

To date, one of the property owners has allowed removal activities through verbal access authorization.

ROUTING AND TRANSMITTAL SLIP

Date

03/28/2005

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Karen Buerki	KB	3/28/05
2. Don Rigger	DR	3/29/05
3. Matt Taylor	M. T.	3/29/05
4. Winston A. Smith	WAS	4/4/05
5.		
6.		
7.		
8.		
9.		
10.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	✓ Signature
Coordination	Justify	Other

FROM: (Name, org. symbol, Agency/Post)	Room No. - Bldg.
Environmental Protection Agency	Phone No.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions.

Remarks:

Karen Buerki 3/28/05
Karen Buerki, OSC

RDR 3/29/05
Don Rigger, Chief, ERS

Shane Hitchcock 3/29/05
Shane Hitchcock, Chief, ERB

WAS 4/4/05
Winston A. Smith, Director, WMD